

TAKEROOT JUSTICE

December 20, 2023

VIA ECF

The Honorable Joseph A. Marutollo
United States District Court
Eastern District of New York
225 Cadman Plaza East, Chamber N 631
Brooklyn, NY 11201

Re: **Molina, et. al. v. Xia et. al., 22-cv-00864-PKC-JAM**

Dear Judge Marutollo:

As counsel to the Plaintiffs in this matter, we write to submit a status letter pursuant to the Court's Order dated December 7, 2023. We described the relevant history in a status letter filed last week on December 11, so this correspondence is a shorter update on events since the last status letter.

Yesterday, we filed on behalf of Plaintiffs a request for a Certificate of Default with the Clerk of the Court. As soon as the Clerk issues the Certificate, we will move the Court for a default judgment against all Defendants. The motion filings will include declarations from each Plaintiff. Because all of the Plaintiffs require translation services, we note here that the process of simply collecting declarations will likely take 60 to 90 days. The collection of signed declarations is time-intensive both because of the translation process and because many of the Plaintiffs are no longer physically located in New York State.

We appreciate Your Honor's attention to this matter.

Sincerely,
/s/ Naoki P. Fujita
Counsel to Plaintiffs

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